

RECONSTRUCTION AND ALTERATION PROJECTS – EXEMPTION FROM DSA APPROVAL

IR A-10

References:

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California Building Standards Administrative Code, Sections 4-306, 4-308, 4-309, 4-315, 4-336 & 5-102

California Education Code, Sections 17295 & 81133

Discipline: Structural, Fire & Life Safety, and Access Compliance

This Interpretation of Regulation (IR) is intended for use by the Division of the State Architect (DSA) staff, and as a resource for design professionals, to promote more uniform statewide criteria for plan review and construction inspection of projects within the jurisdiction of DSA. This IR indicates an acceptable method for achieving compliance with applicable codes and regulations, although other methods proposed by design professionals may be considered by DSA.

This IR is reviewed on a regular basis and is subject to revision at any time. Please check the DSA web site for currently effective IR's. Only IR's listed in the document at <http://www.dsa.dgs.ca.gov/Publications/default.htm> (click on "DSA Interpretations of Regulations Manual") at the time of plan submittal to DSA are considered applicable.

Purpose: The purpose of this interpretation is to clarify when plans and specifications for reconstruction, or alteration projects governed by the California Education Code (CEC) sections 17280-17317, 17365-17374, and 81130-81149, collectively known as the "Field Act", are required to be submitted to the Division of the State Architect (DSA) for review and approval. Construction projects governed by the Field Act are those projects which occur at public elementary schools, public secondary schools, and public community colleges.

Resolution: Per CEC sections 17295 & 81133, all reconstruction and alteration projects governed by the Field Act shall be submitted to the DSA.

1. EXCEPTIONS:

- 1.1 DSA review and approval is not required for alteration projects governed by the Field Act with an estimated construction cost of \$30,407 for 2005, or less.
- 1.2 DSA review and approval is not required for reconstruction or alteration projects governed by the Field Act with an estimated construction cost of greater than \$30,407 but not in excess of \$121,628 for 2005, when all of the following conditions are met:
 - 1.2.1 A structural engineer, licensed to practice in California, shall examine the project and prepare a written statement certifying that the project does not contain any work of a structural nature (a non-structural alteration). This statement shall bear the signature and stamp or seal of the structural engineer and shall be filed with the appropriate DSA regional office.
 - 1.2.2 The design professional in responsible charge of the project shall prepare a statement certifying that the plans and specifications (1) contain no work that is regulated by the accessibility standards of Title 24, (2) contain no work that triggers accessibility upgrades to existing buildings or facilities, and (3) meet any applicable fire and life safety standards. This statement shall bear the signature and stamp or seal of the design professional and shall be filed with the appropriate DSA regional office.
 - 1.2.3 Within 10 days of the project completion, a DSA-certified project inspector shall sign and submit a verified report to DSA, indicating the completed project is in conformance with the plans and specifications. Form DSA-999 "Inspection Verified Report for Projects Exempt from DSA Approval" is available from the DSA web site at <http://www.dsa.dgs.ca.gov/Forms/default>

- 2.** This interpretation does not preclude a design professional from choosing to submit plans and specifications, with the appropriate fee to DSA for review, even when the project is exempted from DSA plan review requirements as outlined herein.
- 3.** Projects not requiring DSA approval shall comply with all currently effective structural, fire & life safety, and accessibility provisions of the California Code of Regulations, Title 24. When authorizing construction of projects described in this interpretation, the school district assumes responsibility to assure compliance with these code provisions.
- 4.** For this interpretation only, “design professional in responsible charge” or “design professional” shall be the architect, structural engineer, or professional engineer (e.g. mechanical engineer for mechanical-only projects, electrical engineer for electrical-only projects), licensed to practice in California, who is responsible for the completion of the project design work.
- 5.** Construction cost thresholds cited in this interpretation are based on January, 1999 figures of \$25,000 and \$100,000 and are adjusted annually per the CEC. Annual adjustments are calculated using the first January issue of Engineering News-Record’s U.S. 20 City Construction Cost Index.
- 6.** Construction projects shall not be subdivided for the purposes of obtaining exemption from DSA review and approval.